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26 April 2017

Research Director
Health, Communities, Disability Services and
Domestic and Family Violence Prevention Committee
Via email: hcdsdfvpc@parliament.qld.gov.au

To the Research Director

Thank you for providing AMA Queensland with the opportunity to provide a submission to the *Public Health (Medicinal Cannabis Affordability) Amendment Bill 2017*.

AMA Queensland is the state's peak medical advocacy group, representing over 6000 medical practitioners across Queensland and throughout all levels of the health system. We value and believe in the work doctors do, and have previously advocated publicly on issues of public health and the medicinal cannabis trials currently occurring in Queensland and elsewhere.

AMA Queensland does not support this bill because we are not yet convinced on the evidence and safety of using medicinal cannabis. Furthermore, we believe the bill enshrines into law a process which is already occurring, and creates a potential cost burden on the Queensland Government.

We will address each of these elements in order.

Safety of Medicinal Cannabis

The AMA accepts that there is a growing body of evidence that certain cannabinoids are effective in the treatment of chronic pain, particularly as an alternative or adjunct to the use of opiates, when the development of opiate tolerance and withdrawal can be avoided.¹ Controlled trials have also shown positive effects of cannabis preparations on bladder dysfunction in multiple sclerosis, tics in Tourette syndrome, and involuntary movements associated with Parkinson's disease.² Based on existing data, the adverse events associated with the short-term medicinal use of cannabis are minor.³

However, the risks associated with long-term medicinal use are less well understood, particularly the risk of dependence, and any heightened risk of cardiovascular disease.⁴

AMA Queensland believes that further evidence is required before medicinal cannabis products are made more widely available, and any promotion of the medical use of cannabinoids will require extensive education of the public and the profession on the risks of the non-medical use of cannabis.

Clause 3: Requiring the Minister to negotiate with the Commonwealth

This bill aims to reduce the cost of medicinal cannabis by amending the *Public Health (Medicinal Cannabis) Act 2016* to insert a new **s214A** which directs Queensland's Health Minister to negotiate with the Commonwealth Government to make medicinal cannabis more affordable.

AMA Queensland believes that this is unnecessary. The Health Minister can already negotiate with the Commonwealth Government now through written correspondence, phone calls or face to face meetings. Indeed,

¹ Lucas, P. 2012, "Cannabis as an adjunct to or substitute for opiates in the treatment of chronic pain", *Journal of Psychoactive Drugs* Vol. 44, pp: 125-33.

² Grotenhermen, F and Muller-Vahl, K., 2012. op. cit.

³ Wang T, et. al., 2008. "Adverse effects of medical cannabinoids: a systematic review", *Canadian Medical Association Journal*, Vol 178, pp: 1669-1678.

⁴ Degenhardt, L and Hall, W., 2008. op.cit.

we have seen the Minister do this recently when he announced that he had requested the Commonwealth to subsidise the cost of medicinal cannabis on the Pharmaceutical Benefits Scheme (PBS).⁵

While we appreciate that the Member for Buderim wants to see the costs for medicinal cannabis for patients become more affordable, trying to achieve this through legislation is an unnecessary and heavy handed way of doing so.

Furthermore, as of late February 2017, the Commonwealth Government has permitted pharmaceutical companies to distribute medicinal cannabis products locally, rather than importing it on a case by case basis as occurs now. This decision should see medicinal cannabis costs for patients begin to fall. This further underscores the redundancy of this bill.

Queensland Government to subsidise the cost of medicinal cannabis

In the new s214A(2)(b), the bill also requires that medicinal cannabis be subsidised, either by the Commonwealth or the State, as a means of making it more affordable.

The Commonwealth Government typically subsidises medicines through the PBS, after the Pharmaceutical Benefits Advisory Committee (PBAC) has determined it is necessary to subsidise a medicine to maintain the health of the community in a way that is cost effective. It is our view that medicinal cannabis would be unlikely to pass that threshold. The recent decision by the Federal Health Minister, Greg Hunt, to reject Queensland's request that medicinal cannabis be PBS subsidised, helps to underline this belief.

If the Commonwealth does not subsidise the cost, which we think is likely, the amendment as written would essentially compel the Minister to "ensure the cost of the lawful treatment of a person... with whole plant medicinal cannabis is affordable" by having the State Government subsidise its cost. AMA Queensland believes that the opportunity cost of doing this would be too high when the public health system in Queensland is already operating in an environment of constrained resourcing. We cannot support this proposal when there are numerous other ways this money could be better spent.

In closing, AMA Queensland does not support this bill as ultimately it duplicates processes which already exists and which do not need a statutory law to direct them to occur. More worryingly, it has the potential to impose another financial burden on the Queensland Government's public health system by subsidising a product for which there is currently very little evidence of its clinical effectiveness. We do not believe the cost of this is justified at this time.

Thank you again for providing us with the opportunity to provide the committee with a submission on this issue. If you require further information or assistance in this matter, please contact Mr Leif Bremermann, Senior Policy Advisor, on 3872 2222.

Yours sincerely



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⁵ Caldwell, F, *Medicinal Cannabis: MP pushes to make medicinal cannabis cheaper through PBS listing*, Brisbane Times (2017). URL: <http://www.brisbanetimes.com.au/queensland/medicinal-cannabis-mp-pushes-to-make-medicinal-cannabis-cheaper-through-pbs-listing-20170322-gv3wzc.html>